

Exhibit D

Addison Lantz

From: Kristen Bonn <secretary@lawsaintlouis.com>
Sent: Friday, July 20, 2018 5:17 PM
To: Jared Goodman; Martina Bernstein
Cc: Brian Klar; Dan Batten
Subject: Casey v. PETA

FOR SETTLEMENT PURPOSES ONLY

Counselors,

As you know, Ms. Casey does not have the funds to continue defending against PETA's claims in this case. This includes continuing to pay for our representation. We have therefore been instructed by our client to conduct no other work on this case besides potentially settling this matter, including any discovery. If we cannot settle this matter, Ms. Casey is likely going to be representing herself for the remainder of the case.

In light of this, we are canceling the upcoming inspection so that we can focus on settling this matter. You have previously made a settlement offer that essentially provided that (1) Ms. Casey would agree to a consent judgment as to her alleged violation of the ESA and its regulations, and enjoining her from future violations and owning or possessing endangered chimpanzees in the future, (2) transferring her chimpanzees to a GFAS accredited sanctuary at PETA's selection, and (3) Ms. Casey would agree to transfer ownership and possession of all remaining exotic animals she owns to a facility of PETA's selection.

Ms. Casey is generally agreeable to the proposed terms. However, be advised that Ms. Casey no longer owns any other exotic animals. She has recently had to sell them in order to finance her defense of PETA's claims. Also, she is not going to agree not to own or possess exotic animals in the future. Not only is this term vague, it is irrelevant to PETA's claims and is a relief that PETA could not receive.

We request that you advise us by July 25, 2018, whether your clients are still willing to settle under the above proposed terms, not to include Ms. Casey's exotic animals (since she doesn't own any) or any injunction regarding her future possession of exotic animals.

Very Truly Yours,
Brian D. Klar
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